

United States Bankruptcy Court  
Eastern District of Pennsylvania

In re Tatyyna Petrosov

Debtor

Case No. 19-16061/amc  
Chapter 13

RESPONSE TO MOTION FOR RELIEF OF  
THE BANK OF NEW YORK MELLON ET AL

Debtor, Tatyyna Petrosov by her counsel,, Bradly E. Allen files this Response as follows:

1. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
2. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
3. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
4. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
5. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
6. Admitted.
7. Admitted.
8. Admitted.
9. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
10. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
11. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
12. Admitted.
13. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
14. Denied. It is specifically denied that the Debtor is behind on arrears post-petition for payments due from December 1, 2020 through September 1, 2021. To the contrary, Debtor states that she made most of her mortgage payments during the aforementioned time period with the exception of the months of December/2020,

February/2021, April/2021, and June/2021. As a result, the averments in this paragraph are therefore deemed denied.

15. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.

WHEREFORE, Debtor request this Honorable Court to deny the Motion for Relief of The Bank of New York Mellon, et al.

Respectfully submitted,

/s/Bradly E. Allen, Esquire  
Attorney for Debtor, Tatyna Petrosov

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ORDER

AND NOW, this                    day of                   , 2021 upon Motion of The  
Bank of New York Mellon fka The Bank of New York, et al and Debtor's Response  
it is hereby:

ORDERED that the Motion for Relief of The Bank of New York Mellon fka The  
Bank of New York, et al is denied.

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HONORABLE ASHELY M. CHAN  
U.S. BANKRUPTCY JUDGE

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